

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRITISH TELECOMMUNICATIONS PLC,)
)
)
Plaintiff,)
)
)
v.) C.A. No. 11-1249 (LPS)
)
)
GOOGLE INC.,)
)
)
Defendant.)

**DEFENDANT GOOGLE INC.'S
MOTION TO BIFURCATE DAMAGES FROM LIABILITY**

Pursuant to Federal Rule of Civil Procedure 42(b), Defendant Google Inc. hereby moves the Court for an Order bifurcating damages from the liability issues for the purposes of both expert discovery and trial. The grounds for this motion are fully set forth in Defendant Google Inc.'s Opening Brief in Support of Its Motion to Bifurcate Damages from Liability, submitted herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

OF COUNSEL:

Dimitrios T. Drivas
Kevin X. McGann
Jeffrey J. Oelke
John P. Scheibeler
Robert E. Counihan
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036
(212) 819-8200

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)
Paul Saindon (#5110)
Eleanor G. Tennyson (#5812)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@mnat.com
psaindon@mnat.com
etennyson@mnat.com
Attorneys for Defendant

June 10, 2013

RULE 7.1.1 CERTIFICATE

Pursuant to D. Del. L.R. 7.1.1, counsel for Defendant Google Inc. certifies that the subject matter of this motion was discussed with counsel for Plaintiff British Telecommunications PLC, but the parties were unable to reach an agreement.

June 10, 2013

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on June 10, 2013, upon the following in the manner indicated:

Melanie K. Sharp, Esquire
Monte T. Squire, Esquire
Robert M. Vrana, Esquire
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801

VIA ELECTRONIC MAIL

James H. Shalek, Esquire
Robert Mayer, Esquire
Joon Yoon, Esquire
Fabio Tarud, Esquire
Jonathan M. Sharret, Esquire
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036

VIA ELECTRONIC MAIL

Justin J. Daniels, Esquire
Sean D. Whaley, Esquire
PROSKAUER ROSE LLP
One International Place
Boston, MA 02110-2600

VIA ELECTRONIC MAIL

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)